

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Draft Title V, No. V-98-013  
Alcatel Magnet Wire, Inc.  
2615 East Highway 146  
May 3, 2000  
Ralph Gouge - Reviewer

*Source Description:*

This facility manufactures magnet wire for the electronics industry. This source is major for volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

*Type of control and efficiencies:*

Thermal and catalytic incineration will control the VOC from the enameling machines, the Aumann enameler excepted, with a 98% overall efficiency. The Aumann enameler utilizes catalytic incineration which controls to a 90% overall efficiency, which is above the 85% required by the regulation. The three MOCO round wire-shaped enameling machines will operate with destruction efficiencies of 85% as required by regulation 59:190. This permit issuance will require that the company perform destruction efficiency tests on one of each type of enameler to make sure they are complying with regulatory requirements.

*Emission factors and their sources:*

Emission point 8 (500) emissions were determined by stack testing  
Emissions for the enameling machines were determined by engineering estimates  
Emissions for the enamel storage tank were determined by engineering estimates  
Emissions for the natural gas-fired devices were taken from AP-42

*Applicable regulation(s):*

Regulation 401 KAR 59:190, New insulation of magnet wire operations, applies to the enameling machines VOC emissions and the storage tank VOC emissions as they are part of the coating line. This source is also major for two Hazardous Air Pollutants (HAP's), (xylene, phenol) and is subject to regulation 401 KAR 63:060, Hazardous air pollutants and source categories. There are no other applicable regulations.

*Regulations that are not applicable:*

The enamel storage tanks and cresylic acid storage tank are not subject to any storage tank regulation because of the non-applicability resulting from, size limitations and/or classification date cutoffs in the various regulations. Additionally, there are not any regulations which will apply to the electric or natural gas-fired combustion units.

*Credible Evidence:*

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52 Section 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.